

02-17

ORIGINAL

Lawrence W. Katz
Regulatory Counsel
Legal Department

DOCKET FILE COPY ORIGINAL



RECEIVED

JAN 11 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1515 North Courthouse Road
Suite 500
Arlington, VA 22201-2909

Phone 703 351-3071
Fax 703 351-3658
lawrence.w.katz@verizon.com

January 11, 2002

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Special Temporary Authority to Provide Reverse Directory Assistance

Dear Ms. Salas:

The Verizon telephone companies¹ ("Verizon") respectfully request special temporary authority to provide operator-provided and electronic reverse directory assistance services on an integrated basis without complying fully with the Commission's Comparably Efficient Interconnection ("CEI") requirements, pending review of Verizon's Petition for Waiver, which is being filed concurrently. A copy of that petition is attached. The Commission has defined reverse directory assistance as an enhanced or information service which would otherwise need to be provided consistent with CEI requirements.

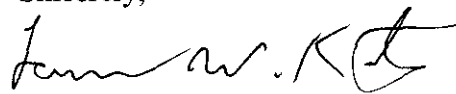
The Common Carrier Bureau, by informal staff action, has granted similar temporary authority to the Qwest and SBC telephone companies. Subsequently, as shown in the attached Petition for Waiver, those companies received permanent CEI waivers for operator-provided and electronic reverse directory assistance. This followed earlier permanent waivers granted to BellSouth, US WEST, and Ameritech for their offer of electronic reverse directory assistance services. Thus, all former Bell operating companies, other than Verizon, have been authorized to offer reverse directory assistance services without meeting CEI requirements.

¹ The Verizon telephone companies ("Verizon") are the local exchange companies affiliated with Verizon Communications Inc. listed on Attachment 1.

Grant of special temporary authority will give the public the benefits of increased competition for integrated (forward and reverse) directory assistance services at an early date, pending review of a permanent waiver. In this way, the public will be able to select Verizon as a single source for both forms of directory assistance. Given the presence of national competition for these services, no competitive harm will occur by allowing Verizon to enter this integrated market. It will also enable former GTE companies in several states to offer reverse directory assistance where currently provided pursuant to approved state tariffs.

Accordingly, Verizon respectfully requests special temporary authority. Thank you for your prompt attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Lawrence W. Katz", with a stylized flourish at the end.

Lawrence W. Katz

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

In the Matter of the)
)
Petition of the Verizon)
telephone companies for Waiver of)
Comparably Efficient Interconnection)
Requirements to Provide)
Reverse Directory Assistance)

JAN 11 2002

CC Docket No. *OR-17*
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITION FOR WAIVER

I. Introduction and Summary

The Verizon telephone companies¹ request a waiver of the comparably efficient interconnection (CEI) requirements to allow Verizon to offer reverse directory assistance services on an integrated basis. As shown below, grant of this waiver will allow Verizon to meet public demand for this service, will improve efficiency, and will not adversely impact competition. Therefore, approval of this request is in the public interest.

The Commission has previously granted waivers similar to that requested here to other former Bell Operating Companies, including the Qwest, BellSouth and SBC telephone

¹ The Verizon telephone companies ("Verizon") are the local exchange carriers affiliated with Verizon Communications Inc. listed in Attachment A.

companies.² Verizon's reverse directory assistance services are substantively the same as the services of those companies, and waiver of CEI requirements for Verizon's service is equally appropriate and in the public interest. Further, Verizon will agree to be bound by the two conditions placed on the recent waivers granted to SBC and Qwest, compliance with the Commission's joint cost rules and amendment of Verizon's cost allocation manual, as appropriate, pursuant to the Commission's rules. *See SBC/Qwest Waiver* at ¶ 13, 47 C.F.R. §§64.901 and 64.903(b).

II. Verizon Meets the Requirements For CEI Waiver.

In approving a similar waiver to SBC and Quest, in addition to finding that competition will not be harmed, the Commission based its finding of good cause on four showings made in the waiver requests: (1) other companies are already providing similar services, (2) customers will benefit from additional companies providing these services, (3) the companies can provide services efficiently using existing operators and databases, and (4) the cost of CEI compliance would outweigh any potential benefits. *SBC/Qwest Waiver* at ¶ 11. Verizon shows below that its request meets these requirements.

² *Petition of Nevada Bell, Pacific Bell, Southwestern Bell Telephone Company, Southern New England Telephone Company, and Ameritech Michigan Bell, Ohio Bell, Illinois Bell, Indiana Bell, and Wisconsin Bell Telephone Companies to Provide Operator Assisted Reverse Directory Assistance Services and Electronic Reverse Directory Assistance Services, and for Waivers of and/or Forbearance from Any Comparably Efficient Interconnection or Telecommunications Act of 1996 Requirements, and Petition of Qwest Corporation to Provide Operator-Assisted Reverse Directory Assistance Service and for Waiver of Any Comparably Efficient Interconnection Requirements Deemed Applicable*, CC Docket Nos. 00-227 and 01-126, DA 01-2516 (rel. Nov. 1, 2001) ("*SBC/Qwest Waiver*"), *Ameritech Petition for Waiver of Computer III Rules for Reverse Search Capability*, 13 FCC Rcd 8762 (1997); *US West Communications, Inc. Petition for Computer III Waiver*, 11 FCC Rcd 7997 (1996); *US West Communications, Inc. Petition for Computer III Waiver*, 11 FCC Rcd 1195 (1995).

A. Service Description

Verizon customers can currently obtain standard (“forward”) directory assistance by calling a Verizon directory assistance operator or by accessing Verizon’s electronic directory assistance services. Customers may request telephone number listings by specifying the name of a person or business, and the address or locality for the requested name. This information is matched with listings in databases maintained in Verizon-owned storage facilities, and the requested telephone number is provided to the customer by the operator, recorded announcement or electronic screen display, as appropriate.

Verizon’s operator-provided and electronic reverse directory assistance will provide customers an efficient and effective means to obtain the listed name and address associated with a telephone number specified by the customer, excluding non-published numbers. Reverse directory assistance service will be provided and accessed in the same manner as forward directory assistance, *i.e.*, by calling an operator or transmitting an electronic query. The telephone number specified by the customer will be used to search for a matching listing in the same Verizon-owned database storage facilities, and the customer will receive the listed name and address associated with the requested telephone number through a “live” operator, recorded announcement, or electronic screen display.³

³ Like the Qwest and SBC services, Verizon’s reverse directory assistance will in many cases involve retrieval of name and address information stored in facilities outside the LATA in which the caller is situated. The Commission has found that such retrieval constitutes incidental interLATA services under section 271(g)(4) of the Act. *SBC/Qwest Waiver* at ¶ 17. Because this is an information service for which the separate affiliate requirement has sunset, it can be offered on an integrated basis within the former Bell Atlantic portion of Verizon consistent with the Act. *See* 47 U.S.C. § 272(f)(2). The former GTE portion of Verizon is not subject to structural separation for provision of information services. Therefore, integrated provision of the proposed reverse directory assistance service throughout Verizon is consistent with the Act and Commission requirements.

B. Grant of the Waiver Will Not Adversely Affect Competition.

Competitors will not be disadvantaged by allowing Verizon to offer reverse directory assistance. As the Commission requires, Verizon already provides competitors, both local exchange carriers and directory assistance providers, access to the same database listings of Verizon subscribers, including daily updates, that Verizon uses for its existing directory assistance service and that it plans to use for its reverse directory assistance service. *Petition of Bell Atlantic for Forbearance from Section 272 Requirements in Connection With National Directory Assistance*, 14 FCC Rcd 21484 (1999); *Petition of Bell Atlantic for Further Forbearance from Section 272 Requirements in Connection With National Directory Assistance*, 15 FCC Rcd 6053 (2000).

In addition, as shown below, several companies already provide both forward and reverse traditional directory assistance services nationwide, and others offer CD-ROM and Internet-based services that include similar reverse directory features. All of this competition has developed and grown during a time when several former Bell companies have offered reverse directory assistance pursuant to earlier waivers under the same conditions Verizon seeks here. It is apparent that grant of this waiver will likewise not harm competition.

C. Other Companies Are Providing Similar Services.

As the Commission has already acknowledged, several companies currently offer reverse directory assistance on a nationwide basis. *SBC/Qwest Waiver* at ¶ 9. These include AT&T, Cincinnati Bell, Metro One, and Excell Agent Services, which provide reverse directory assistance as an integral part of their directory assistance services. Other providers include various CD-ROM and internet directory companies, including InfoSpace, AT&T Anywho, InfoUSA, Switchboard, DirectoryUSA, and WhoWhere, that now offer competitive alternatives

that are quick and convenient and increasingly competitive with voice telephony services.

Because competition already is entrenched in the market, grant of the waiver to allow Verizon to enter free of CEI obligations would not adversely affect competition.⁴

D. Customers Will Benefit from Having Additional Companies Provide this Service

Grant of the requested CEI waiver will permit Verizon to offer a service that customers desire. Competitors already offer reverse directory assistance, and customers expect Verizon to do the same. As the Commission noted in the *SBC/Qwest Order*, Verizon's RDA service will provide customers an additional choice in obtaining reverse listing information and assure them the benefits of competition. *Id.* at ¶ 11. Grant of the waiver is, therefore, pro-competitive.

E. Verizon Can Provide Reverse Directory Assistance Efficiently Using the Same Operators and Databases Already Used to Provide Other Directory Services

Reverse directory assistance will be provided using the same operators and the same databases as are now used in connection with forward directory assistance. In this way, integrated provision of forward and reverse directory assistance is far more efficient than to require Verizon to use completely separate personnel, service provisioning, and databases. Competitors provide the services on an integrated basis, which is more convenient to customers, because they can combine forward and reverse directory assistance inquiries with one operator call or electronic database query and need not dial separate numbers or initiate separate queries of different databases. Therefore, reverse directory assistance is a logical extension of forward

⁴ Reverse directory assistance is currently being offered as an intrastate service in several states in the former GTE territory pursuant to approved state tariffs. There have been no allegations in those jurisdictions that such provision has in any way harmed competition.

directory assistance service that for purposes of customer ease of use and operational efficiency can best be provided utilizing substantially the same service architecture and components.

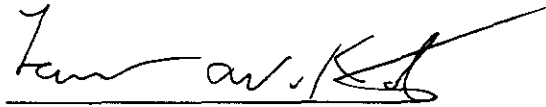
F. The Cost of CEI Compliance Outweighs the Potential Benefits.

Complying with all CEI requirements would require an extensive revision to Verizon's service delivery systems, database interfaces and protocols. Such revisions, including switch reconfigurations, database changes, and labor, are estimated to cost in excess of \$200 million. This cost, together with the resultant delays, would likely make it inefficient and impractical for Verizon to deploy reverse directory assistance and clearly outweighs any possible benefit to the public or to competition. As shown above, the public clearly benefits by having access to an additional competitor providing integrated directory assistance service. Moreover, given the continued and growing number of competitors to other Bell companies, competition will continue to thrive after grant of the waiver. Therefore, the cost/benefit test is met.

III. Conclusion

Accordingly, Verizon respectfully requests that the Commission grant the requested CEI waiver for Verizon's provision of electronic and operator assisted reverse directory assistance services.

Michael E. Glover
Edward Shakin
Of Counsel

A handwritten signature in black ink, appearing to read "Lawrence W. Katz", written over a horizontal line.

Lawrence W. Katz
1515 North Court House Road
Suite 500
Arlington, Virginia 22201-2909
(703) 351-3071

Attorney for the Verizon
telephone companies

January 11, 2002

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.